

**DECLARATION OF SHELIA D. CRAWFORD**

I, Shelia D. Crawford, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

**I. BACKGROUND**

1. I am the President of the Pickens County Branch of the National Association for the Advancement of Colored People (“Pickens NAACP”). I have served in that role for more than 23 years and can attest to the effect that the School District of Pickens County’s (“SDPC”) removal of Ibram X. Kendi’s and Jason Reynolds’ book *Stamped: Racism, Antiracism, and You* harms members of the Pickens NAACP. Prior to my role as President of the Pickens NAACP, I have also previously served as the Second Vice President for the Pickens Branch.

2. The Pickens NAACP is a nonprofit, nonpartisan membership organization in South Carolina. The Pickens NAACP has served its members in Pickens County, SC since 1967. The Pickens NAACP is a branch of the National Association for the Advancement of Colored People (“NAACP”). The NAACP’s mission is to “achieve equity, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all people of color.”

3. The Pickens NAACP represents members and children of members who attend school throughout the School District of Pickens County, including D.W. Daniel High School, Pickens High School, Liberty High School, and Easley High School, among others.

**II. THE DISTRICT’S REMOVAL OF *STAMPED: RACISM, ANTIRACISM, AND YOU* FROM SCHOOL CLASSROOMS AND LIBRARIES**



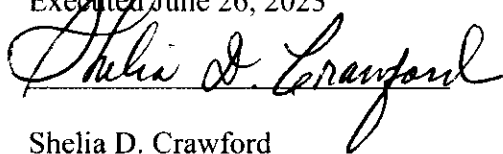
4. Members of the Pickens NAACP are harmed by the District's removal of *Stamped* from all classrooms and libraries in the School District of Pickens County.

5. Members of Pickens NAACP are denied the opportunity to receive the information, ideas, and viewpoints expressed in *Stamped*. They are denied the opportunity to engage in reading, discussing, and evaluating the text with their teachers and classmates. And they are denied the opportunity to explore, read, and assess the text individually through access from a school or classroom library.

6. This ban is especially harmful to members of Pickens NAACP because the ideas in *Stamped* discuss issues relating to race and racism in America, topics which are closely related to the work and mission of the Pickens NAACP. The information shared and ideas expressed in *Stamped* help prepare children to understand and reckon with the heritage of racism and racist thought that has shaped American society since its founding. These ideas are directly aligned with the Pickens NAACP's mission to fight racism and race-based discrimination and ensure equity and inclusion for Black people and all other people of color.

7. The District's removal of *Stamped* from all schools deprives members of the Pickens NAACP from their right to receive information, to enjoy academic freedom, and to engage in discussion, debate, and dialogue about the ideas expressed in *Stamped*.

Executed June 26, 2023

A handwritten signature in black ink, reading "Shelia D. Crawford". The signature is written in a cursive style with a large, stylized initial "S".

Shelia D. Crawford

President, Pickens County Branch of the NAACP